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## The Canadian Consumer Product Safety Coalition Provides Comments to the House of Commons Standing Committee on Health

The Canadian Consumer Product Safety Coalition is comprised of the Canadian Institute of Plumbing & Heating and eleven major national business associations representing total annual sales in Canada of an estimated \$600 Billion. Coalition member companies include domestic manufacturers, importers, distributors, wholesalers and retailers of all sizes, right across Canada.

Consumer safety and consumer product safety are extremely high priorities for the Coalition and its member companies. As industry leaders we know that our collective success depends on retaining consumer confidence and maintaining our duty as responsible corporate citizens. It is for this reason that we provided our comments on Bill C-36, the *Canada Consumer Product Safety Act*.

The Coalition and its member companies support the modernization of Canada's product safety law and we welcome Bill C-36. Since the legislation was first tabled, the Coalition has been consistent in recommending improvements to strengthen the Bill. And we have seen improvements with each reiteration, from C-52 to C-6 to the current form, Bill C-36.

We support the three key elements that define this new legislation, which include: active prevention; targeted oversight; and rapid response. These are important goals for Canada and are fundamental if we are to ensure our legislation is aligned with other leading product safety regimes internationally. Indeed, Bill C-36 is a positive step towards achieving these goals.

Going forward, it will be important for Health Canada to build upon certain provisions in the legislation and to outline how they will be administered. We understand these issues will be addressed in regulations, policies and guidance documents.

Following the passage of this important Bill, we are committed to working with Health Canada and other government agencies to ensure that Canada's product safety regime delivers the intended health and safety benefits to consumers. At the same time, we want to ensure that the new regime can be effectively administered by Health Canada, and that companies in the business of delivering safe consumer products to Canadians can comply with the Bill.

We would like to note that, for some time many coalition member companies have had voluntary incident management reporting systems and control frameworks. These systems include sophisticated information gathering systems. Our member companies have much experience sifting through consumer complaints and investigating reports in order to identify what is a genuine and significant product hazard situation. They have an established track record of effectively and efficiently executing the goals and objectives of Bill C-36, and they will continue to proactively ensure high standards are in place while responding responsibly and quickly when an issue with a product is identified.

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We strongly recommend that Health Canada leverage off this knowledge base of best practices and experience as we go forward with the implementation of this Bill. We want to ensure Canada's product safety regime will be administered by Health Canada in a way that aligns with the regimes in other leading countries, including the member countries of the European Union and the United States, and with the procedures of other federal and provincial government departments and authorities.

In summary, the Coalition supports the principles in Bill C-36 and we look forward to working with Health Canada as they proceed with the implementation of the Bill.

**FOOTNOTE:**

It appears that the Standing Committee on Health will proceed directly to the Clause-by-Clause study. The Consumer Product Safety Coalition is not expecting negative amendments being brought forward. We have heard of a possible friendly amendment regarding the interpretation of business days as it relates to incident reporting. The Coalition will be meeting with various MP Health Critics. We don't yet have a read on how the Bill will be treated in the Senate but our expectation is that it will move quickly.

[CLICK HERE](#) for a copy of Bill C-36.

[CLICK HERE](#) for a copy of the full submission by the Coalition to Health Canada.

Coalition members consist of:

- Canadian Association of Importers & Exporters;
- Canadian Copper and Brass Development Association;
- Canadian Federation of Independent Business;
- Canadian Gift & Tableware Association;
- Canadian Hardware & Housewares Manufacturers Association;
- Canadian Institute of Plumbing & Heating;
- Canadian Toy Association;
- Canadian Water Quality Association
- Electro-Federation Canada;
- Juvenile Products Manufacturers Association;
- Retail Council of Canada;
- Vinyl Council of Canada.

The Canadian Institute of Plumbing & Heating is a not-for-profit trade association. Founded in 1933, the Institute is a vibrant organization committed to providing members with the tools for success in today's competitive environment. More than 250 companies are members of this influential Canadian industry association. They are the manufacturers, wholesaler distributors, master distributors, manufacturers' agents and allied companies who manufacture and distribute plumbing, hydronic heating, industrial, waterworks and other mechanical products. CIPH wholesalers operate more than 700 warehouses and showrooms across Canada. Total industry sales exceed \$5 billion annually.



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